# **EXHIBIT A**

#### **COMPLETING ALL DISCOVERY:**

- (a) ESI PROTOCOL AGREEMENT: December 6, 2019
  - a. Exchange of first draft of ESI Protocol by December 4, 2019
- (b) WRITTEN DISCOVERY: January 31, 2020
  - a. Includes service of written answers to interrogatories, production of all responsive documents, and production of privilege logs.
- (c) **DEPOSITIONS**: February 28, 2020

## **EXPERT WITNESS DISCLOSURES:**

- (a) DISCLOSURE OF CITY'S RULE 26(a)(2) EXPERT INFORMATION: March 6, 2020
- (b) DISCLOSURE OF ACLU-TN'S RULE 26(a)(2) EXPERT INFORMATION: April 13, 2020
- (c) DISCLOSURE OF CITY'S RULE 26(a)(2) REBUTTAL EXPERT INFORMATION: May 8, 2020
- (d) DEADLINE FOR ACLU-TN DEPOSITION OF CITY'S REBUTTAL EXPERT: May 27, 2020

## FILING ALL JOINTLY-PROPOSED MODIFICATIONS: April 17, 2020

### **PUBLIC WRITTEN COMMENT PERIOD:**

- 1. The Court will accept written comments on this matter from Friday, April 3, 2020 through Monday, May 4, 2020.
- 2. The procedure for written public comments will be set out in a separate order. The Parties shall submit proposals for the public comment procedure by no later than **January 17, 2020.**

#### TRIAL:

- 1. The **non-jury trial** in this matter, which is anticipated to last 2 days, is set to begin on **June 17, 2020 at 9:30 a.m**. in a courtroom to be designated by the District Court courtroom sharing plan.
- 2. Trial briefs are due by no later than 4:30 p.m. on June 3, 2020